

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
Civil DIVISION

John Klosterman  
(Enter Above the Name of the Plaintiff in this Action)

1:20 CV 119

vs.

City of Cincinnati  
(Enter above the name of the Defendant in this Action)

**J. COLE**

If there are additional Defendants, please list them:

See Appendix A  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**MJ. BOWMAN**

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

John Klosterman  
Name - Full Name Please - PRINT  
639 Steiner Ave  
Street Address  
Cincinnati OH 45204  
City, State and Zip Code  
513 250 2610  
Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. City of Cincinnati  
Name - Full Name Please  
801 plum ST # 150  
Address: Street, City, State and Zip Code
2. See Appendix A
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

## II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☒ Title 28 U.S.C. § 1343(3)  
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☐ Title 28 U.S.C. § 1331  
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)  
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☐ Title \_\_\_\_\_ United States Code, Section \_\_\_\_\_  
[Other federal status giving the court subject matter jurisdiction.]

### III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

① The named defendants have conspired to use their official positions and under color of law to deny Plaintiff of rights to his property

② Defendants have used tools of their office liens, Judgement, violations, denial of approvals, massive fines, which are ridiculous in the least not applied to other in the neighborhood whose properties are in actual disrepair. These actions were taken against plaintiff in a capricious malicious and retaliatory manner.

③ the laws fines and administrative actions were not taken in a manner consistent with equal application of law

④ the administrative process within the City/State makes any meaningful chance of Resolution impossible and it is designed to force certain land owners to divest of properties, pay extortionate fines, or risk incarceration

See Appendix b



IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.  
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case Number

Caption

1:18CV194 US of America vs. John + Susan Klostner

vs.

vs.

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

Plaintiff Sue each named defendant  
\$500K in their person and professional  
capacit compensatory damage and \$500k  
punitive from each named defendant  
Further, going forward the court  
restrain defendants from additional  
arbitrary administrative action

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 13 day of February, 2020.

John Klostner  
Signature of Plaintiff

Appendix B

### III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

5 Supervisory personnel named as  
defendants should be aware of  
the actions of Subordinates and  
it is their failure to look into  
previous complaints of which they have  
been made aware the strip them  
of deniability of Responsibility

## **APPENDIX A**

### **Defendant(s)**

#### **Sedamsville Community Development Corp.**

758 Steiner Ave  
Cincinnati, Ohio 45204

#### **Dale Kreis**

Current address unknown

#### **Sedamsville Civic Association**

617 Steiner Ave  
Cincinnati, OH 45204

Patricia A. Burke - President - Sued in her professional & personal capacity  
20772 Georgetown Rd  
Lawrenceburg, IN 47025

Cindy Bastin - Sued in her professional & personal capacity  
758 Steiner Ave  
Cincinnati, OH 45204

#### **City of Cincinnati Building Department**

805 Central Avenue  
Cincinnati, OH 45202

Art Dahlberg, Director - Sued in his professional & personal capacity  
Ed Cunningham - Sued in his professional & personal capacity  
Lonnie Wise - Sued in his professional & personal capacity  
Terry James - Sued in his professional & personal capacity  
Jerry Meyer - Sued in his professional & personal capacity  
Shawn Manahan - Sued in his professional & personal capacity  
Dave Hardinger - Sued in his professional & personal capacity

Will Cohen - Sued in his professional & personal capacity

**Housing Court Prosecutor**

Tim Horsley, Chief Prosecutor  
1000 Main St # 149  
Cincinnati, OH 45202

**City Solicitor's Department**

801 Plum St # 214  
Cincinnati, OH 45202

Paula Boggs Muething - Sued in her professional & personal capacity

Jacklyn Martin - Sued in her professional & personal capacity

**Honorable Bernie Bouchard** - Sued in his professional & personal capacity

1000 Main Street, Room 160  
Cincinnati, OH 45202

**Cincinnati Health Department - Lead Department**

3301 Beekman Street  
Cincinnati, OH 45225

Rashmi Aparajit, Director - Sued in her professional & personal capacity

Joe Wolfe - Sued in his professional & personal capacity

**Cincinnati Litter Patrol for Sedamsville**

Two currently unknown employees of litter patrol

**Mayor John Cranley** - Sued in his professional & personal capacity

801 Plum St # 150

Cincinnati, OH 45202

**Chris Cain** - Sued in his professional & personal capacity  
647 Sedam Street  
Cincinnati, OH 45204

**Hamilton County Landbank**  
3 E 4th St #300  
Cincinnati, OH 45202

Jessica Powell - Sued in her professional & personal capacity  
Kelley Allesee - Sued in her professional & personal capacity

**Office of Administrative Hearings**  
Chris Liu - Sued in his professional & personal capacity  
805 Central Avenue  
Cincinnati, OH 45202